

# **EXHIBIT C**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MARK I. SOKOLOW, *et al.*,

Plaintiffs,

vs.

THE PALESTINE LIBERATION  
ORGANIZATION, *et al.*,

Defendants.

No. 04 Civ. 00397 (GBD) (RLE)

**EXHIBIT 1-1**

**PLAINTIFFS' WITNESS LIST**

**FACT WITNESSES**

Plaintiffs will call the following fact witnesses to testify in person about the Predicate Attacks and/or the injuries they suffered and continue to suffer by reason of Defendants' acts of international terrorism:

1. Baker, Dr. Katherine
2. Bauer, Binyamin
3. Bauer, Daniel
4. Bauer, Dr. Alan J.
5. Bauer, Revital
6. Bauer, Yehonathon
7. Bauer, Yehuda
8. Blutstein, Dr. Richard
9. Blutstein, Rebekah
10. Carter, Dr. Larry
11. Choffel, Shaun
12. Coulter Miller, Dianne
13. Coulter, Robert L. Jr.
14. Coulter, Robert L. Sr.

15. Goldberg, Chana Bracha
16. Goldberg, Eliezer Simcha
17. Goldberg, Esther Zahava
18. Goldberg, Karen
19. Goldberg, Zvi
20. Goldberg, Shoshana Malka
21. Goldberg, Tzvi Yehoshua
22. Goldberg, Yaakov Moshe
23. Goldberg, Yitzhak Shalam
24. Gould Elliott, Shayna Eileen
25. Gould, Elisa Janet
26. Gould, Ronald A.
27. Gritz, Nevenka
28. Guetta, Oz Joseph
29. Guetta, Varda
30. Mandelkorn, Shaul
31. Mandelkorn, Nurit
32. Mandelkorn, Leonard
33. Pearlman, Meshulam
34. Rine, Jessica
35. Sokolow, Elana R.
36. Sokolow, Jamie A.
37. Sokolow, Lauren M.
38. Sokolow, Mark I.
39. Sokolow, Rena M.
40. Stein, Alex
41. Waldman, Eva
42. Waldman, Henna Novack
43. Waldman, Morris
44. Waldman, Shmuel

Plaintiffs may call the following fact witness to testify in person about Defendants' acts of international terrorism:

1. Al Sheikh, Hussein
2. Fayyad, Salam
3. Rabbo, Yasser Abed
4. Yousef, Mosab Hassan

Plaintiffs may call to testify by deposition each witness whose deposition testimony has been designated on Exhibit 2-1 about the subjects so designated.

Plaintiffs may call the following fact witnesses to testify in person about Plaintiffs' injuries suffered by reason of Defendants' acts of international terrorism:

1. Constantini, Dr. Shlomo
2. Deeb, Maher
3. Fenner, Dr. Geoffrey
4. Gedalia, Dr Judith
5. Hoffman, Ronald
6. Kessler, Martin
7. Lifschitz, Moshe
8. Noam, Dr. Chay
9. Perry, Dr. Tuvia
10. Pidhorz, Dr. Carole
11. Pogron, Dr. Chaim
12. Rozenman, Dr. Yaacov
13. Shah, Alpesh
14. Stein, Dr. Arnold
15. Wang, Dr. Richard
16. Yitzhaki, Menahem
17. Zallik, Ned

Plaintiffs may call the following fact witnesses in person to serve as foundational witnesses for documents introduced by Plaintiffs during trial:

1. Benichou, Pierre
2. Feldner, Yotam
3. Goldberg, Zvi
4. Hazut, Anat
5. Lerner, Aaron
6. Pearlman, Meshulam
5. Queri, Ahmed
7. Reiss-Wolicki, Linda
8. Roth, Roland
9. Segal, Yifa
10. Shaked, Roni
11. To the extent there is a genuine dispute as to authenticity or admissibility, a representative designated by Defendants to testify about the creation and maintenance of the martyr files designated as trial exhibits
12. To the extent there is a genuine dispute as to authenticity or admissibility, a representative designated by Defendants to testify about the creation and maintenance by the PA's General Intelligence Service ("GIS") of GIS records designated as trial exhibits
13. To the extent there is a genuine dispute as to authenticity or admissibility, a representative designated by Defendants to testify about the creation and maintenance by the PA of records designated as trial exhibits concerning the pay and promotion of employees the PA's Security Forces and Marwan Bargouti
14. To the extent there is a genuine dispute as to authenticity or admissibility, a representative designated by Defendants to testify about the creation and maintenance by the PA of records designated as trial exhibits concerning payments to or in respect of perpetrators of the Predicate Attacks by the PA's Ministry of Detainees and Ex-Detainees
15. To the extent there is a genuine dispute as to authenticity or admissibility, a representative designated by Defendants to testify about the creation and maintenance by the PA of publications or broadcasts designated as trial exhibits that on their face are attributed to the PA, or an entity owned or controlled by the PA, including, but not limited to PA TV, Wafa, al-Hayat al-Jadida, Watani, Al Shurta and Al Shuhada
16. To the extent there is a genuine dispute as to authenticity or admissibility, a representative designated by Defendants to testify about the creation and maintenance

by the PA and/or PLO about any other document created and/or maintained by Defendants, and/or produced by Defendants in this action

#### **EXPERT AND SUMMARY WITNESSES**

The following witnesses will testify in person as expert witnesses about Defendants' acts of international terrorism, and ratification thereof, including the Predicate Attacks, as well as the relationship between the Palestinian Liberation Organization, the Palestinian Authority, Fatah and the Al Aqsa Martyrs Brigades:

1. Eviatar, Alon
2. Levitt, Matthew
3. Marcus, Itamar
4. Shrenzel, Israel

The foregoing witnesses will also testify as summary witnesses about evidence concerning the foregoing subjects.

The following witnesses may testify in person as expert witnesses about Defendants' acts of international terrorism, including the Predicate Attacks, and/or the relationship between the Palestinian Liberation Organization, the Palestinian Authority, Fatah and the Al Aqsa Martyrs Brigades:

1. Addicott, Jeffrey
2. Karsh, Efraim

The following witnesses may testify in person about the Israeli legal system, including its Military Courts and civilian courts, and/or the convictions of the perpetrators of the Predicate Attacks and their co-conspirators:

1. Kaufman, Nick
2. Newton, Michael
3. Reisner, Daniel
4. Shnoor, Boaz

One or more of the foregoing witnesses will also testify as summary witnesses about evidence concerning the foregoing subjects.

The following witnesses will testify in person as expert witnesses about Plaintiffs' injuries and/or damages suffered by reason of Defendants' acts of international terrorism:

1. Friedman, Alan
2. Soudry, Michael
3. Strous, Rael
4. Weinstein, Dov

Upon the request of opposing counsel, Plaintiffs will provide opposing counsel with contact information for any of the individuals listed above, except for those individuals under the control of Defendants.